

STIPULATION AND ORDER TO STAY PROCEEDINGS (4th Request)

1 for thirty (30) days, in order to allow the parties to facilitate settlement.

2 3. The Court entered the parties' stipulation as an Order on January 14, 2016.

3 4. The Court's Order was due to expire on February 5, 2016.

4 5. Due to continuing settlement discussion, the parties stipulated to stay the matter
5 for a second time on February 3, 2016.

6 6. The Court entered the parties' second stipulation as an Order on February 9,
7 2016.

8 7. Due to continuing settlement discussion, the parties stipulated to stay the matter
9 for a third time on March 3, 2016.

10 8. The Court entered the parties' third stipulation as an Order on April 7, 2016.

11 9. Productive settlement discussions are still ongoing, and accordingly, in an effort
12 to facilitate those efforts, as well as to minimize attorneys' fees and other legal expenses, the
13 parties believe that the present civil action should be stayed for an additional thirty (30) days.

14 10. Therefore, the parties agree that the Court may enter the following Order and
15 request that the Court do so accordingly:

16 a. Except as otherwise provided below, this action shall be stayed for a
17 period of thirty (30) days from the date this stipulation is filed with the Court.

18 b. The stay shall immediately terminate upon Plaintiff's filing with the
19 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's
20 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*
21 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.
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23

c. The parties stipulate that nothing in this delay shall be deemed to prejudice Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

SO STIPULATED AND AGREED on this 7th day of April, 2016.

THE AMIN LAW GROUP, NV., LTD.

RANDAZZA LEGAL GROUP, PLLC

/s/ Ismail Amin, Esq.

/s/ Marc J. Randazza, Esq.

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Attorney for Plaintiff

Attorney for Defendant

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated. April 20, 2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th of April, 2016, I served a true and correct copy of:
STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (4th Request),
postage fully prepaid and addressed to the following:

_____ serving the following parties via US Mail, postage prepaid;

 X serving the following parties via CM/ECF;

_____ serving the following parties via facsimile;

_____ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.
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Attorney for Defendant

 /s/ Teresa Armendariz
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